

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re:*

MICHAEL DAVID GREENFIELD  
*a.k.a.* MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**ORDER SCHEDULING HEARING ON CHAPTER 15 PETITION AND  
SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE OF HEARING**

Upon the application (the “**Application**”) of the Lior Dagan, the trustee and foreign representative of Michael David Greenfield (“**Greenfield**” or the “**Debtor**”) in Greenfield’s insolvency proceeding (the “**Greenfield Proceeding**”) in the District Court of Tel Aviv-Yafo under the State of Israel’s Insolvency and Economic Rehabilitation Law, 5778-2018, for entry of an order scheduling a hearing on the *Petition (Official Form 401)* and *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* (collectively, the “**Chapter 15 Petition**”) in this Chapter 15 Case and specifying the form and manner of service of notice of the hearing; it is hereby:

ORDERED, that the form of the Notice attached hereto is hereby approved; and it is further

ORDERED, that copies of the Notice, the Chapter 15 Petition and the documents filed in support thereof (collectively, the “**Notice Documents**”) shall be served by email, fax, first class mail or FedEx, within ten (10) business days of entry of the order approving the relief sought in this Motion, to: (a) the Office of the United States Trustee for the Southern District of New York, (b) the Debtor, and (c) all known parties against whom provisional relief is sought as set forth in the statements of Foreign Representative required by Federal Rule of Bankruptcy Procedure 1007(a)(4)(B), attached to the Chapter 15 Petition, provided that, for creditors who are parties to

the Greenfield Proceeding, the Notice Documents may be served on their counsel of record in that proceeding; and it is further

ORDERED, that service of the Notice Documents in accordance with this Order, is hereby approved as adequate and sufficient notice, and shall constitute valid service of the Notice Documents on all interested parties; and it is further

ORDERED, that a hearing (the “Hearing”) on the relief sought in the Chapter 15 Petition as well as responses or objections, if any, to the Notice Documents shall be held on September 14, 2021 at 10:00 a.m. New York time, or as soon thereafter as counsel shall be heard. The Hearing will be held telephonically and conducted via Court Solutions LLC; parties may register at [www.court-solutions.com](http://www.court-solutions.com) to listen to or participate in the Hearing; and it is further

ORDERED, that responses or objections, if any, to the Notice Documents must be in a writing describing the basis therefore and shall be filed with the Court electronically in accordance with General Order M-242 by registered users of the Court’s electronic case filing system, and by all other parties in interest, on a compact disk, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, with a hard copy to the United States Bankruptcy Judge, and served upon Seiden Law Group LLP, 322 Eighth Avenue, Suite 1704, New York, New York 10001 (Attention: Amiad Kushner, Esq.), United States counsel to Lior Dagan as foreign representative for Michael David Greenfield, so as to be received on or before 4:00 p.m. ET on September 7, 2021; and it is further

ORDERED, that the Hearing may be adjourned from time to time without notice other than an announcement in open court at the Hearing or the adjourned date of the hearing; and it is further

ORDERED, that all notice requirements specified in section 1514(c) of Bankruptcy Code not incorporated herein are otherwise waived; and it is further

ORDERED, that service pursuant to this Order shall be good and sufficient service and adequate notice of the hearing to consider all the relief sought in the Chapter 15 Petition.

Dated: August 6, 2021  
New York, New York

/S/ Shelley C. Chapman  
THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit**

**Form of Notice**

Amiad Kushner  
Jacob K. Jou  
Dov B. Gold  
SEIDEN LAW GROUP LLP  
322 Eighth Avenue, Suite 1704  
New York, NY 10001  
Telephone: (646) 766-1914

*Attorneys for Lior Dagan as Foreign Representative of  
Michael David Greenfield (a.k.a. Michael Ben-Ari)*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re:*

MICHAEL DAVID GREENFIELD  
*a.k.a.* MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**NOTICE OF FILING AND HEARING ON VERIFIED PETITION UNDER CHAPTER  
15 OF THE UNITED STATES BANKRUPTCY CODE AND  
NOTICE PURSUANT TO FED. R. BANKR. P. 9017 AND FED R. CIV. P. 44.1**

**PLEASE TAKE NOTICE** that, on July 28, 2021, Lior Dagan, in his capacity as the court-appointed trustee and duly authorized foreign representative (the “**Foreign Representative**” or “**Trustee**”) of Michael David Greenfield (“**Greenfield**” or the “**Debtor**”), in Greenfield’s insolvency proceeding (the “**Greenfield Proceeding**”) in the District Court of Tel Aviv-Yafo under the State of Israel’s Insolvency and Economic Rehabilitation Law, 5778-2018 (the “**Insolvency Act**”), filed a *Petition (Official Form 401)* (the “**Petition**”) and a *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* (the “**Verified Petition**,” and collectively with the Petition, the “**Chapter 15 Petition**”), commencing a case under chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”) ancillary to the Greenfield Proceeding and seeking recognition of such foreign

proceeding as a “foreign main proceeding” and relief in aid of the Greenfield Proceeding in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** that a copy of the Petition is attached hereto, along with: (i) the lists required to be filed with the Petition pursuant to Bankruptcy Rule 1007(a)(4); (ii) the Verified Petition; (iii) the Declaration of Lior Dagan in Support of the Verified Petition required to be filed pursuant to section 1515 of the Bankruptcy Code; and (iv) the Declaration of Sivan Lev, the Trustee’s Israeli Counsel in Support of the Verified Petition (collectively, the “**Supporting Documents**”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Order Scheduling Hearing on Verified Chapter 15 Petition and Specifying Form and Manner of Notice of Hearing (the “Scheduling Order”), a copy of which is attached hereto, the Bankruptcy Court has scheduled a hearing on September 14, 2021 at 10:00 a.m. (ET), before the Honorable Shelley C. Chapman (the “Hearing”). The Hearing will be held telephonically and conducted via Court Solutions LLC; parties may register at [www.court-solutions.com](http://www.court-solutions.com) to listen to or participate in the Hearing.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 2002-4, at the Hearing the Bankruptcy Court may order the scheduling of a case management conference to consider the efficient administrative of this case.

**PLEASE TAKE FURTHER NOTICE** that any party in interest wishing to submit a response or objection to the Chapter 15 Petition or the relief requested by the Trustee must do so pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure, including, without limitation, Federal Rules of Bankruptcy Procedure Rule 1011, in writing and setting forth the bases therefore, and such response or objection must be filed with the Office of

the Clerk of the Court, Room 534, One Bowling Green, New York, New York 10004-1408; and served on the attorneys for the Trustee, (Seiden Law Group LLP, 322 Eighth Avenue, Suite 1704, New York, New York 10004 U.S.A., Attn: Amiad Kushner, Esq.), so as to be received **on or before 4:00 p.m. E.T. on September 7, 2021.**

**PLEASE TAKE FURTHER NOTICE** that any response or objection to be filed with the Office of the Clerk of the Court must be filed (i) electronically by registered users of the Bankruptcy Court's electronic case filing system in accordance with General Order M-242 of the Bankruptcy Court for the Southern District of New York, a copy of which may be viewed on the Bankruptcy Court's website, [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov); and (ii) by all other parties in interest on a compact disk, with hard copy provided to the Chambers of the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, New York, New York 10004 U.S.A.

**PLEASE TAKE FURTHER NOTICE** that all parties in interest opposed to the Chapter 15 Petition or the Trustee's request for relief must appear at the Hearing at the time and place set forth above.

**PLEASE TAKE FURTHER NOTICE** that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Trustee without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

**PLEASE TAKE FURTHER NOTICE** that Trustee intends to raise issues pertaining to foreign law, specifically Israel law, in connection with the Chapter 15 Petition: (i)

recognizing the Greenfield Proceeding as a foreign main proceeding pursuant to chapter 15 of the Bankruptcy Code and the Trustee as Greenfield's foreign representative under sections 1509 and 1517 of the Bankruptcy Code; (ii) granting automatic relief pursuant to section 1520 of the Bankruptcy Code; (iii) granting other and additional relief pursuant to sections 1507 and 1521(a) and (b) of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that copies of the Chapter 15 Petition and certain other pleadings filed contemporaneously therewith are available by accessing the Court's Electronic Case Filing System, which can be accessed from the Court's website at <https://ecf.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) and/or upon written request to the Trustee's counsel addressed to:

SEIDEN LAW GROUP LLP  
322 Eighth Avenue, Suite 1704  
New York, NY 10001  
Telephone: (646) 766-1914  
Attn: Amiad Kushner

Dated: August \_\_, 2021  
New York, New York

SEIDEN LAW GROUP LLP

/s/ Amiad Kushner  
Amiad Kushner  
Jacob K. Jou  
Dov B. Gold  
322 Eighth Avenue, Suite 1704  
New York, NY 10001  
Telephone: (646) 766-1914

*Attorneys for Lior Dagan as Foreign  
Representative of Michael David  
Greenfield (a.k.a. Michael Ben-Ari)*